

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

CITY OF FORT COLLINS,

Plaintiff/Counterclaim Defendant,

v.

OPEN INTERNATIONAL, LLC,

Defendant/Counterclaim Plaintiff,

OPEN INVESTMENTS, LLC,

Defendant.

Civ. No. 3:25-mc-155

WRIT OF GARNISHMENT

TO: TUALATIN VALLEY WATER DISTRICT

You are now a Garnishee. AS A GARNISHEE, YOU NEED TO KNOW THE FOLLOWING:

Open International, LLC (“Debtor”) owes money to the City of Fort Collins (“Creditor”). A judgment was entered against the debtor for the debt, or the debt otherwise became subject to garnishment, on March 28, 2024. The Debtor’s employer identification number is 47-4867636.

The amount subject to garnishment is \$20,912,327.36. This writ garnishes all of the following:

- All property of the Debtor (including money) that is in your possession, control or custody at the time this writ is delivered to you.
- All debts that you owe the Debtor at the time this writ is delivered to you, whether or not payment is due on the debt at the time you receive this writ.

YOU MUST ANSWER THIS WRIT BY COMPLETING THE ATTACHED GARNISHEE RESPONSE WITHIN THE TIME ALLOWED BY LAW, WHETHER OR NOT YOU HOLD ANY OF THE DEBTOR'S PROPERTY OR OWE ANYTHING TO THE DEBTOR. IF YOU DO NOT TRUTHFULLY ANSWER THIS WRIT, OR YOU DO NOT DELIVER MONEY OR PROPERTY WHEN YOU ARE REQUIRED TO DO SO, YOU WILL BE LIABLE TO THE CREDITOR.

If you have questions, you should contact an attorney. Court employees cannot give you legal advice. The Creditor's attorney cannot give you legal advice.

A writ of garnishment may be issued only by the court administrator, by the attorney for the Creditor or by a person who is specifically authorized by law to issue garnishments. This writ is issued by:

Melissa Aubin, Clerk of the Court
United States District Court of Oregon
Mark O. Hatfield U.S. Courthouse
1000 S.W. Third Ave.
Portland, OR 97204

This writ is valid only if it has been delivered to you within 60 days after the date of issuance. If the court administrator is issuing this writ, the date of issuance is the date the court

administrator signs the writ.

DEBTOR:

Open International, LLC
c/o Hernando Parrott, Registered Agent
6060 SW 79 Street
South Miami, FL 33143

CREDITOR:

City of Fort Collins
c/o Dorsey & Whitney, LLP
1400 Wewatta Street, Suite 400
Denver, CO 80202

ATTORNEYS FOR CREDITOR:

Benjamin D. Greenberg
Columbia Center
701 Fifth Avenue, Suite 6100
Seattle, WA 98104-7043

Case Collard
Dorsey & Whitney, LLP
1400 Wewatta Street, Suite 400
Denver, CO 80202

CERTIFICATION

I certify that I have read this writ of garnishment and to the best of my knowledge, information and belief, there is good ground to support issuance of the writ, and the amount indicated as subject to garnishment is lawfully subject to collection by this writ.

DATED this 20th of February, 2025.

/s/ Benjamin D. Greenberg

Benjamin D. Greenberg, OSB # 182745
DORSEY & WHITNEY, LLP

*Attorney for Plaintiff/Counterclaim
Defendant City of Fort Collins*

COURT SEAL

Issued by the court administrator on March 7, 2025.



MELISSA AUBIN, CLERK OF COURT

By: 

Deputy Clerk